

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Manhattan Telecommunications Corp.,  
d/b/a Metropolitan Telecommunications,  
a/k/a MetTel  
44 Wall Street, 6<sup>th</sup> Floor,  
New York, NY 10005

Index No.: 08 Civ 3829  
(JSR)

Plaintiff

v.

Global Naps, Inc,

Defendant.

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**STATEMENT OF MATERIAL FACT PURSUANT TO RULE 56.1**

1. MetTel is licensed to sell and resell telecommunications services in all jurisdictions relevant to this case. Aronow Aff. Par 1.
2. MetTel has filed tariffs in every jurisdiction relevant to this case regarding for interstate and intrastate access and Local interconnection. Aronow Aff. Par. 2
3. Global Naps passes telecommunications traffic to MetTel and Global Naps receives compensation from others for completing such calls. Aronow Aff. Par 5.
4. Global Naps has refused to pay compensation to MetTel when MetTel completes calls for Global Naps and renders bills to same. Aronow Aff. Par 3. Amended Answer Par 17

5. The nature of the service that MetTel provides in its tariff is the same as it provides to Global Naps. Aronow Aff. Par 5.
6. The amount due under the Bills from MetTel was \$269,835.29 as of the time frame March 2008 bill dates. Aronow Aff. Par.3. A. Compl.

Exhibit A.

Respectfully submitted,



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